US ERA ARCHIVE DOCUMENT

CHILD-RESISTANT PACKAGING REVIEW

Technical Review Branch

Reviewed by Rosalind L. Gross D4/17/98

EPA Reg. No. or File Symbol 64240-34

DP Barcode _____

EPA Petition or EUP No. _____

Date Division Received ____

Type Product(s) Insecticide

Data Accession No(s).443881-01.

Product Mgr./Chemical Review Mgr/Contact Person PM 03 Division RD

Product Name(s) _____

Company Name(s) _____

Submission Purpose Examine to ascertain if packaging is CRP

Summary of Findings

Active Ingredient(s), PC code, & %

The station tested is black 40ml HIPS base, black 40ml HIPS lid, improved smear weld. Results indicate 2 children accessed one bait station each and a third child (pkg 29) tore plastic, but station was not considered accessed. Registrant should be reminded that definition of access needs to include any access to bait (e.g. expose bait, touch bait, suck bait, crack station, ripping the station, putting a hole in it, bait fall out, poking the bait out, etc.). The CRP test needs to address all of these possibilities. This is a pass of the child test according to the sequential test chart in 16 CFR 1700.20. This study will only support the CRP certification for EPA Reg No 64240-34 if the station to be sold is the same number of bait stations per retail box, smear welded, the size, color, type plastic, plastic thickness, etc. are the same as the station tested. The CRP certification needs to identify station size, color, type plastic, plastic thickness, and type of welding to determine its acceptability.

Fipronil